**DNR / PEI FILE EXCHANGE NOTES**
July 13, 2005

Attendees:
Verne Schrunk – DNR
Ken McFadden –PEI

- **POLICY/GUIDANCE AND/OR JUDGMENT ISSUES:**

**7LTK02, Warren County Oil Co., Indianola,** 2004 SMR L2N, recommend reject, previously accepted as H2L (8/24/04) letter. (Rev-SS, QA-KM).

Selected section as presented in the draft RP letter:

The Department of Natural Resources (DNR) has received the 2004 Site Monitoring Report (SMR) for the referenced site. Thank you for the submittal. The report recommends the site be reclassified from low risk to "no action required." Upon reviewing the report and file information, we cannot reclassify the site at this time.

**Following paragraph for DNR review:**

The low risk site classification that was previously accepted (August 24, 2004 DNR letter) was contingent upon the results of additional groundwater sampling. Based on groundwater contamination data from recently constructed monitoring well MW-29, the low risk classification is rescinded, and the site is once again classified high risk. Be advised that the department is not requiring corrective action at this time, but rather will allow high risk monitoring to be conducted due strictly to site-specific circumstances. Refer to deficiency 1 (below).

An SMR is considered to be complete if it contains all the information and data required by the DNR's administrative rules and guidance. The referenced report is incomplete and unacceptable because:

1. **For DNR review:**

   It has **not** been demonstrated that the groundwater contamination plume is not migrating from groundwater BTEX source MW-2 toward sanitary sewer receptor ASSR-1. In fact, the presence of groundwater benzene contamination in recently constructed monitoring well MW-29 confirms that the plume has migrated toward ASSR-1. **Given the historically variable groundwater flow and proximity of MW-29 to ASSR-1 (<10 ft), continued groundwater monitoring at the subject site is mandatory.**

   a. As indicated in the benzene (B) column of the Groundwater Source Receptor Summary Table (p. 3) and explained in the legend, risk reclassification criteria for the high and low risk receptors have **not** been satisfied. As such, the current risk for each at-risk groundwater receptor should correspond to the risk listed in the B column.
   **NOTE:** Revising the receptor risks will result in a high risk classification for the site.

   b. In addition to continued monitoring of all wells in the groundwater monitoring plan, exit monitoring criteria must also be satisfied in recently constructed groundwater monitoring well MW-29 in order to reclassify ASSR-1 "no action required."

      **NOTE:** Be advised that corrective action will be required if future groundwater contamination concentrations necessitate Tier 2 reevaluation and ASSR-1 is determined to be high risk.

   c. Proposals advocating a discontinuation of groundwater monitoring at recently constructed well MW-29 (p. 7 and App. 1) are inaccurate and invalid.

i. Reason 1 describes a hypothetical situation – i.e., reevaluating Tier 2 pathways using the current groundwater contamination data set – that is **not** allowed in rule or guidance. Refer to the DNR web page entitled "Site Monitoring Report General Comments," which was posted on the Internet 1/30/02, for circumstances necessitating reevaluation of Tier 2 pathways.

ii. Contrary to reason 2, monitoring well MW-3 was **not** a transition well for high risk receptor ASSR-1, but rather strictly a transition/guard well for low risk potential confined space and potential sanitary sewer receptors (January 1999 Tier 2 Report). Regardless, acceptance of a Tier 2 Report by the department does **not** preclude the department from subsequently identifying salient deficiencies in said report and requiring their correction. Refer to the fourth paragraph of the February 9, 1999 DNR letter (pp. 1-2). Additionally, a discussion of MW-3's location with respect to service lines is irrelevant, since sanitary sewer service lines are **not** at risk.

iii. Although the recent benzene concentration in MW-29 is less than the site-specific target level for ASSR-1, as indicated in reason 3, **only one** sampling event has occurred in MW-29 – a point which is clearly stated prior to describing reason 3 in the paragraph.

Refer to file deliverables and draft RP letter for additional text and def's.

**9LTA86, Multi-County Oil Company, North English,** RT2 (7th-revision), HR, teleconference letter format used, (Rev-SS, QA-KM).

Selected section as presented in the draft RP letter:

The department has identified some technical problems in the *SEVENTH REVISION* of the Tier 2 SCR. Be aware the comments and problems noted below may affect pathways, receptors, risk classification, site-specific target levels (SSTLs), and the proposed monitoring plan. Your certified groundwater professional should be prepared to discuss how these deficiencies will be addressed during the teleconference.

1. Response 3 in the May 31, 2005 cover letter for the latest revised Tier 2 SCR is inaccurate, does **not** relate in any way to deficiency 3 in the April 1, 2005 DNR letter, and demonstrates your groundwater professional's lack of awareness of certain site activities. **Furthermore, the Tier 2 Report your groundwater professional claims was never reviewed by the department was, in fact, received by the department on June 25, 2004, promptly reviewed, and <u>rejected</u> in a DNR letter dated August 11, 2004.** Note that a report dated and received by the department in June 2004 could **not** possibly have been submitted in response to a letter the DNR drafted on August 11, 2004. In addition, refer to deficiency 6 (below).

Refer to draft RP letter for def's 2-5…

6. With respect to deficiencies 1.c and 2 in the April 1, 2005 DNR letter regarding the *August 2004 Tier 2 revisions and 2004 Site Monitoring Report*, references to software accompanying the June 2004 Tier 2 Report – either stated or implied in the corresponding responses in the May 31, 2005 cover letter for the latest revised Tier 2 Report – are irrelevant since the June 2004 Tier 2 Report is **not** discussed in the department's April 1, 2005 review letter. The fact remains that Tier 2 Report submittals for the subject site have repeatedly reverted to incorporating inaccurate and/or invalid modeling parameters and data sets, as described in the April 1, 2005 DNR letter.

Refer to file deliverables and draft RP letter for additional text and def's.

## Project Management

**7LTB16: Former Sothman Texaco, Davenport**, SMR/RT2, HR, (Rev-EM, QA-TG) GW monitoring was done roughly 1 year after soil overexcavation (unsuccessful -site remained HR for soil/SL). Re-classification is not recommended in the SMR. Only the T2 revisions were reviewed. Review letter for previous RT2/OE report allowed high risk monitoring (DNR modified PEI draft which requested CADR). Current draft RP letter includes HR monitoring sections from previous letter.

> **Note to DNR**: The 6/7/2005 SMR was not reviewed, as it is not a reclassification SMR. Tier 2 revisions and the Tier 2 software file included with the SMR were reviewed. Soil over excavation was completed approximately 1 year prior to the groundwater sampling reported in the SMR. The Soil Vapor and Soil Leaching to Groundwater Vapor to Enclosed Space pathways remain high risk. Continued high risk monitoring is requested in this draft Responsible Party letter.
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> **For DNR Review** (6/17/2004 letter section, VKS, is copied here): DNR considers the site as having undergone remediation. A number of proposals were presented in the April 27, 2004 cover letter with the Over Excavation Report received 5/5/2004 for future site activities, which essentially constitute a Tier 3 approach since soil contamination considerably above the SSTL remains and theoretically could 'leach' to groundwater. We have the following comments regarding these.
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> The monitoring proposal is the T2 monitoring plan with addition of wells B1, B2, PMW1, MW15, (For DNR Review:) (Monitoring Well MW15 was installed within the OE on the eastern side but somewhat north of MW10) and a confirmation vapor sample from VP2. The only monitoring relevant to the remediation (OE) and the soil leaching concept is the re-installation of MW3 and installation of PMW1. The remainder address the low risk concerns. The six-month groundwater sampling interval is acceptable. Guidance suggests groundwater monitoring is done for three years.
>
> Monitoring is required. DNR rules require you to retain a certified groundwater professional to conduct all site monitoring activities. A Site Monitoring Report (SMR) must be submitted to DNR within 30 days after each sampling event. The next SMR must be submitted by October 30, 2005